

FILED 20 JUL 23 14:40 USDC ORE

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

UNITED STATES OF AMERICA

6:23-cr-00242-MC

v.

INDICTMENT

RANDY LEE COOK,

18 U.S.C. § 2252A(a)(2) and (b)(1)  
18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

Defendant.

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

COUNT 1

(Distribution of Child Pornography)  
(18 U.S.C. § 2252A(a)(2) and (b)(1))

On or about June 30, 2020, in the District of Oregon, defendant RANDY LEE COOK knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate or foreign commerce;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

**COUNT 2**

**(Distribution of Child Pornography)**  
**(18 U.S.C. § 2252A(a)(2) and (b)(1))**

On or about November 13, 2020, in the District of Oregon, defendant **RANDY LEE COOK** knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate or foreign commerce;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

**COUNT 3**

**(Distribution of Child Pornography)**  
**(18 U.S.C. § 2252A(a)(2) and (b)(1))**

Between on or about March 5 and 26, 2021, in the District of Oregon, defendant **RANDY LEE COOK** knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means or facility of interstate or foreign commerce;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

**COUNT 4**

**(Possession of Child Pornography)**  
**(18 U.S.C. § 2252A(a)(5)(B) and (b)(2))**

On or about June 11, 2021, in the District of Oregon, defendant **RANDY LEE COOK** knowingly possessed child pornography, as defined in Title 18, United States Code, Section 2256(8), which contained a visual depiction of a minor engaged in sexually explicit conduct, and at least one such image of child pornography involved a prepubescent minor who had not attained 12 years of age, such image having been mailed, shipped, and transported in or affecting interstate and foreign commerce by any means, including by computer;

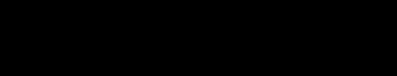
In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

**CRIMINAL FORFEITURE ALLEGATION**

Upon conviction of any of the offenses listed above, defendant **RANDY LEE COOK**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any and all matter which contains visual depictions of minors engaged in sexually explicit conduct that were produced, received, transported, shipped, distributed, or possessed in violation thereof, and any and all property used or intended to be used in any manner or part to commit or to promote the commission of the aforementioned violations, including without limitation one Samsung S9 Cell Phone.

Dated: July 20, 2023

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

NATALIE K. WIGHT  
United States Attorney

A handwritten signature of William M. McLaren.

WILLIAM M. McLAREN  
Assistant United States Attorney